

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1338-***
v.)	(Consolidated)
)	
APPLE COMPUTER, INC., et al.,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE
REVISED SECOND AMENDED COMPLAINT**

Plaintiffs Honeywell International Inc. and Honeywell Intellectual Properties Inc. (“Honeywell”) hereby move the Court for leave to file a Revised Second Amended Complaint in the form attached here to as Exhibit A. The grounds for this motion are as follows:

1. On July 28, 2006, Honeywell filed a Motion for Leave to File a Second Amended Complaint (D.I. 515), and attached the proposed Second Amended Complaint to the Motion as Exhibit A. On October 23, 2007, the Court issued an Order granting Honeywell’s motion (D.I. 896).

2. On October 24, 2007, Honeywell filed the Second Amended Complaint which was attached to its Motion as an exhibit (D.I. 897). However, in the 15 months between the filing of Honeywell’s Motion and the Court’s Order, many of the defendants named in the Second Amended Complaint settled and were dismissed from the case.

3. Therefore, Honeywell has prepared a Revised Second Amended Complaint, which is attached hereto as Exhibit A, for the purpose of removing the following previously-named defendants who have been dismissed from this case: Arima Display

Corporation; AU Optronics Corp.; AU Optronics Corporation America; BOE Technology Group Company Ltd.; Beijing BOE Optoelectronics Technology Co., Ltd.; Casio Computer Co., Ltd.; Casio, Inc.; Citizen Systems Europe; Citizen Systems America Corporation; Fuji Photo Film Co., Ltd.; Fuji Photo Film U.S.A., Inc.; Fuji Photonix Co., Ltd.; HannStar Display Corporation; Hitachi, Ltd.; Hitachi Displays, Ltd.; Hitachi Display Devices, Ltd.; Hitachi Electronic Devices (USA), Inc.; International Display Technology; International Display Technology USA, Inc.; Koninklijke Philips Electronics N.V.; Philips Consumer Electronics North America; Philips Electronics North America Corporation; Quanta Display Inc.; Sony Corporation of America; ST Liquid Crystal Display Corp.; Toppoly Optoelectronics Corp.; TPO Displays Corporation; Wintek Corp.; Wintek Electro-Optics Corporation; Wistron Corporation; M-Display Optronics Corp.; Seiko Epson Corporation; Epson Imaging Devices Corporation; and Sanyo Epson Imaging Devices Corp. A red-lined version of the proposed Revised Second Amended Complaint is attached hereto as Exhibit B.

WHEREFORE, Honeywell respectfully requests that the Court grant leave to file the Revised Second Amended Complaint. A proposed form of Order is attached hereto as Exhibit C.

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November 6, 2007
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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to all registered participants.

I also certify that on November 6, 2007, I caused to be served true and correct copies of the foregoing on the following as indicated below:

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